

BOIES SCHILLER FLEXNER LLP

David Boies (*pro hac vice*)
333 Main Street
Armonk, NY 10504
(914) 749-8200
dboies@bsfllp.com

Maxwell V. Pritt (SBN 253155)
Joshua M. Stein (SBN 298856)
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
(415) 293-6800
mpritt@bsfllp.com
jstein@bsfllp.com

Jesse Panuccio (*pro hac vice*)
1401 New York Ave, NW
Washington, DC 20005
(202) 237-2727
jpanuccio@bsfllp.com

David L. Simons (*pro hac vice*)
55 Hudson Yards, 20th Floor
New York, NY 10001
(914) 749-8200
jischiller@bsfllp.com
dsimons@bsfllp.com

*Counsel for Individual and Representative Plaintiffs
and the Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

CASE NO. 3:23-cv-03417-VC

**DECLARATION OF MAXWELL V. PRITT
IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION FOR
CLASS DISCOVERY AND CLASS
CERTIFICATION BRIEFING SCHEDULE**

I, Maxwell V. Pritt, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am a partner in the San Francisco, California office of Boies Schiller Flexner LLP (“BSF”), interim lead counsel for Plaintiffs and the putative class in the above-captioned action. I have personal knowledge of the matters stated herein and if called on, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 and Local Rule 6-3 in support of Plaintiffs’ Administrative Motion for Class Discovery and Class Certification Briefing Schedule (“Administrative Motion”).

2. At the December 19, 2025 Case Management Conference in this action, the Court ordered that Plaintiffs could submit their Administrative Motion to the Court on January 6, 2026. Dkt. 666.

3. During the fact discovery period, including discovery sought by Plaintiffs and ordered by the Court after the December 14, 2024 close of discovery, Plaintiffs’ counsel located evidence that Meta uploaded copyrighted content in the course of its torrenting activity. *See, e.g.*, Dkt. 658-1 ¶¶ 5, 6, 8, 9, 11, 13; Dkt. 658-3; -4; -5; -6; -10; -11; -12; -13; -14. This content includes Plaintiffs’ Asserted Works, as well as copyrighted content in which putative class members hold rights.

4. Attached as Exhibit 1 is a true and correct copy of Meta’s Further Supplemental and Amended Responses and Objections to Plaintiffs’ Second Set of Interrogatories, dated December 13, 2024.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 6th day of January 2026 in Kentfield, California.

By: /s/ Maxwell V. Pritt
Maxwell V. Pritt